

EXHIBIT D
HEFFLER BILL



August 14, 2013

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Re: Esslinger v. HSBC Bank Nevada, N.A. Litigation

For services rendered and expenses incurred from September 1, 2012-July 31, 2013 and to estimate the distribution & post-distribution services as follows (this invoice reflects all activity and applies all payments and advances previously received):

The following represent items that are billed on a per item basis in accordance with the terms of our proposal:

1. Set up, format & proof the Notice and Claim Form and print and mail notice;
2. Process Notices returned as undeliverable and remail notices;
3. Maintain and monitor the toll free telephone system with automated responses (IVR), provided live operators to assist class members;
4. Generate a website and monthly maintenance of site;
5. Respond to claimant correspondence, assist to resolve claimant questions and concerns;
6. Receive and process electronic and paper claims;
7. Review claims and determine if they have any deficiencies that need to be resolved;
8. Estimate the costs to provide the distribution and post-distribution services.

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www.HefflerClaims.com

	<u>Number</u>	<u>Per Item</u>	<u>Amount</u>
<u>Notification Fees & Costs</u>			
• Set up, format and proof the Postcard for mailing			\$5,000.00
• Summary Notice Publication in USA Today			19,380.00
• Initial mailing of Notice	16,423,007	\$0.035	574,805.24
• Postage for mailing			3,777,031.98
• NCOA			6,985.35
• Postcards for Class Members where email was returned	894,000	\$0.05	44,700.00
• Paper claim forms requested by Class Members	30,706	\$0.48	14,738.88
• Processing postcard notices returned as undeliverable	2,150,607	\$0.075	161,295.53
• Data entry of updated address for postcards for remailing	40,383	\$0.55	22,210.65
• Printing of remailed postcards	45,300	\$0.32	14,496.00
• Additional postage for notices, paper claims and correspondence			95,892.97
<u>IVR & Live Operators</u>			
• Set up and design of IVR			3,000.00
• IVR usage - per minute	751,698	\$0.35	263,118.10
• Live Operators-per minute	155,355	\$0.55	85,445.25
• Training of Operators/Agents	15	\$33.00	495.00
• Monthly IVR Maintenance	16	\$150.00	2,400.00
• Programming & Voice, live opt-out feature	3.875	\$200.00	775.00
<u>Website</u>			
• Set up and design			5,000.00
• Monthly maintenance	16	\$150.00	2,400.00
• Programming changes after initial set up	1	\$150.00	150.00
<u>Response to Claimant Correspondence</u>			
• Request for Notice after initial mailing	28,703	\$0.55	15,786.65
• Form Letters	1,535	\$1.00	1,535.00
• Special Letters	147	\$15.00	2,205.00
• E-mail Letters	6,502	\$1.00	6,502.00
• Deficiency Letters	5,674	\$1.00	5,674.00

Calculation and Administration Fees

• Set up fee for programming algorithm, screens & data to allow claim filing on website			25,000.00
• Review and calculate claims			
o Electronic Claims	136,661	\$0.35	47,831.35
o Paper Claims	30,807	\$0.95	29,266.65

Other out of pocket costs

• Telephone			1,552.04
• Copies	14,192	\$0.25	3,548.00
• Fed Ex			10.18
• Post Office Box			<u>1,310.00</u>

\$5,239,574.82

Total

Advances & Payments

06/15/2012 Advance			(3,525,000.00)
06/26/2012 Advance			(475,807.26)
06/26/2012 Advance			(341,391.99)
12/28/2012 Invoice			(477,020.98)
12/28/2012 Invoice			<u>(316,689.78)</u>
			\$103,664.81

Remaining Balance

Distribution & Post-Distribution Services

Number of Checks	160,000	\$0.30	48,000.00
Postage	160,000	\$0.39	62,400.00
Renew P. O. Box			1,400
Returned Checks (Est 10%)	16,000	\$0.10	1,600.00
Skip-Tracing & New Address	10,000	\$0.17	1,700.00
Data Entry new addresses from PO	3,000	\$0.55	1,650.00
Print Reissue Checks	13,000	\$0.60	7,800.00
Postage for reissued checks	13,000	\$0.46	5,980.00
Any tax services/assistance to escrow agent			<u>3,500.00</u>

\$237,660.81